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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RYAN MOSKOWITZ,

Defendant.

Case No. 2:14-CR-00265-JCM-VCF

**STIPULATION TO
CONTINUE SENTENCING**

(Fourth Request)

IT IS HEREBY STIPULATED AND AGREED, by and between DANIEL G. BOGDEN, United States Attorney, and LISA CARTIER-GIROUX, Assistant United States Attorney, counsel for the United States of America, and MICHAEL R. PANDULLO, ESQ., counsel for Defendant RYAN MOSKOWITZ, that the sentencing scheduled for March 30, 2016 at the hour of 11:00 a.m., be vacated and reset to a date and time convenient to this Court, but in no event any sooner than thirty (30) days.

This Stipulation is entered into for the following reasons:

1. The parties have been preparing for sentencing, and need additional time to gather further information pertinent to sentencing factors under 18 U.S.C. Section 3553(a).
2. Defendant is in custody and does not object to this continuance.

3. Counsel has spoken to Assistant United States Attorney Lisa Cartier-Giroux and she has no opposition to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for Defendant sufficient time within which to effectively and thoroughly prepare for the sentencing hearing.

5. Additionally, denial of this request could result in a miscarriage of justice.

6. This is the fourth request to continue this sentencing hearing.

DATED this 29th day of March, 2016.

MICHAEL R. PANDULLO, ESQ.
ATTORNEY FOR DEFENDANT

/s/ Michael R. Pandullo

MICHAEL R. PANDULLO, ESQ.
Attorney for Defendant Ryan Moskowitz

DANIEL G. BOGDEN, ESQ.
UNITED STATES ATTORNEY

LISA CARTIER-GIROUX, ESQ.
ASSISTANT UNITED STATES ATTORNEY

/s/ Lisa Cartier-Giroux

LISA CARTIER-GIROUX, ESQ.
Attorney for the United States

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**FINDINGS OF FACTS,
CONCLUSIONS OF LAW
AND ORDER**

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

This Stipulation is entered into for the following reasons:

1. The parties have been preparing for sentencing, and need additional time to gather further information pertinent to sentencing factors under 18 U.S.C. Section 3553(a).
2. Defendant is in custody and does not object to this continuance.
3. Counsel has spoken to Assistant United States Attorney Lisa Cartier-Giroux and she has no opposition to the continuance.

1 4. The additional time requested herein is not sought for purposes of delay, but
2 merely to allow counsel for Defendant sufficient time within which to effectively
3 and thoroughly prepare for the sentencing hearing.

4 5. Additionally, denial of this request could result in a miscarriage of justice.

5 6. This is the fourth request to continue this sentencing hearing.

6 **CONCLUSIONS OF LAW**

7 The ends of justice served by granting said continuance outweigh the best interest of the
8 public and the defendant in a speedy trial, since the failure to grant said continuance would be
9 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the
10 opportunity within which to be able to effectively and thoroughly prepare for trial taking into
11 account the exercise of due diligence.

12 The additional time requested by this Stipulation is excludable in computing the time
13 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
14 States Code Sections 3161(h)(1)(A), 361(h)(7) and Title 18, United States Code, Sections
15 3161(h)(8)(B) and 3161(h)(8)(B)(iv).

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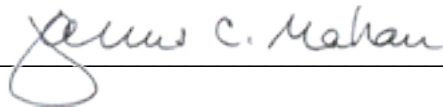
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ORDER

IT IS HEREBY ORDERED that sentencing currently scheduled for March 30, 2016, at the hour of 11:00 a.m., be vacated and continued to **Monday, May 2, 2016 at 10:00 a.m.**

DATED March 29, 2016.

A handwritten signature in dark ink, appearing to read "James C. Mahan", is written over a horizontal line.

UNITED STATES DISTRICT JUDGE

Submitted by:

/s/ Michael R. Pandullo

MICHAEL R. PANDULLO, ESQ.
Attorney for Defendant Ryan Moskowitz